

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

JULIA HUBBARD and KAYLA	§	
GOEDINGHAUS,	§	
	§	
Plaintiffs,	§	Case No. 5:23-cv-00580-FB
	§	
v.	§	
	§	Judge: Hon. Fred Biery
TRAMMELL S. CROW, JR., DR. BENJAMIN	§	Courtroom: 8509
TODD ELLER, RICHARD HUBBARD, DR.	§	Date Action Filed: May 8, 2023
MELISSA MILLER, DR. JOSEPH BOLIN,	§	(transferred)
DR. SCOTT WOODS, DR.	§	
MRUGESHKUMAR SHAH, MICHAEL	§	
CAIN, COE JURACEK, PHILIP ECOB, H.J.	§	
COLE, TEXAS RANGER CODY	§	
MITCHELL,	§	
KURT KNEWITZ, PAUL PENDERGRASS,	§	
RALPH ROGERS, ROBERT PRUIT, SCOTT	§	
BRUNSON, CASE GROVER, RICHARD	§	
BUTLER, MARC MOLINA, MICHAEL	§	
HYNES, JR., SHAWN MAYER, JADE	§	
MAYER, RCI HOSPITALITY HOLDINGS,	§	
INC., INTEGRITY BASED MARKETING,	§	
LLC, STORM FITNESS NUTRITION, LLC,	§	
ULTRA COMBAT NUTRITION, LLC,	§	
ECOLIFT HOMES LLC, ELEVATED	§	
WELLNESS PARTNERS LLC, DOE	§	
INDIVIDUALS 1–20, and DOE COMPANIES	§	
21–30	§	
Defendants.	§	

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**UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMITS**

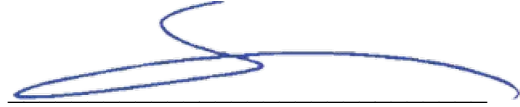
Plaintiffs Julia Hubbard and Kayla Goedinghaus (“Plaintiffs”) request leave to exceed the Court’s page limits and permit Plaintiffs to file a response to Defendants’ Motions to Dismiss that is up to twenty-seven (27) pages long.

Pursuant to Local Rule CV-7(D), parties are limited to twenty (20) pages for non-discovery motions. Plaintiffs’ Complaint is 64 pages long, asserts claims against twenty-nine named

individuals (plus additional unnamed individuals and companies), and asserts four causes of action against all defendants. *See, e.g.*, Complaint at 59. This request for seven (7) additional pages is not for the purpose of delay or to complicate the proceedings but in order to ensure that the issues in dispute are clearly presented to the Court. The Court having granted Defendant Trammell S. Crow's ("Crow") Motion for Leave to Exceed Page Limits for his Motion to Dismiss should grant Plaintiffs' similar Motion for Leave. The additional pages are necessary to address and respond to the claims made in the Defendants' Motions to Dismiss. Plaintiffs have met and conferred with counsel for Defendants and they are unopposed to the relief requested.

Dated: New York, New York  
June 16, 2023

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Matthew W. Schmidt', is written over a horizontal line.

Matthew W. Schmidt\*

John G. Balestriere\*

**BALESTRIERE FARIELLO**

225 Broadway, 29th Floor

New York, New York 10007

Telephone: (212) 374-5401

Facsimile: (212) 208-2613

john.balestriere@balestrierefariello.com

matthew.schmidt@balestrierefariello.com

*\*Admitted Pro Hac Vice*